

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion into the appropriate regulatory plan to succeed price cap regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' retail intrastate telecommunications services in the Commonwealth DTE of Massachusetts

01-31

**PETITION OF AT&T COMMUNICATIONS OF NEW ENGLAND, INC.
FOR LEAVE TO INTERVENE**

AT&T Communications of New England, Inc. ("AT&T") petitions pursuant to 220 C.M.R. §1.03 for leave to intervene as a party to this proceeding. The business address of AT&T is 99 Bedford Street, Boston, Massachusetts 02111.

1. AT&T is a common carrier of telecommunications services authorized by the Department to provide both interLATA and intraLATA services in Massachusetts. AT&T purchases switched access and other services from Verizon New England, Inc. d/b/a Verizon Massachusetts ("Verizon"). AT&T also competes with Verizon in the provision of certain intraLATA telecommunications services in Massachusetts.
2. AT&T was a party to, and an active participant in, all aspects of the proceedings in the original price cap docket, DPU 94-50. AT&T was also a party to, and an active participant in, the annual compliance filings made by Verizon (then New England Telephone and Telegraph) pursuant to the Department's order in DPU 94-50.
3. The present docket has been established by the Department to consider the regulatory plan that will replace the price cap plan adopted in D.P.U. 94-50. Just as AT&T had an interest in D.P.U. 94-50 and the subsequent compliance filings made pursuant to it, AT&T has an interest in the rules that the Department will establish to govern the price of the access service that AT&T must purchase from Verizon and the price of the Verizon retail services with which AT&T will compete.
3. For the foregoing reasons, AT&T will be substantially and specifically affected by the Department's investigation in this docket. AT&T intends fully to participate in the proceedings in this docket.
4. AT&T will be represented in this docket by counsel, as follows:

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5. AT&T request that all papers served on it in connection with this proceeding be served on counsel at the addresses above and on Dr. Patricia Jacobs, 99 Bedford Street, Boston, Massachusetts 02111.

For the foregoing reasons, AT&T requests that it be granted leave to intervene as a party in this proceeding.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

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